

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>In re:</b>	<b>Keith Coleman</b>	)	
		)	
	<b>Debtor.</b>	)	<b>Case No. 3:14-BK-30175-KRH</b>
		)	<b>Chapter 13</b>
		)	
<b>Address</b>		)	
	<b>Keith Coleman</b>	)	
	<b>13705 Nashua Place</b>	)	
	<b>Midlothian, VA 23112</b>	)	
		)	
Last four digits of SSN or ITIN:	<b>1717</b>	)	

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**NOTICE OF MOTION TO EMPLOY SPECIAL COUNSEL**

**Jason M. Krumbein, Esq.** has filed papers with this court seeking approval of employment of special counsel to avoid 2 liens- a deed of trust and a judgment lien.

**Your rights may be affected. You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before **14 DAYS FROM TODAY**, you or your attorney must:

File with the court and mail a copy to the Debtors' counsel, at the addresses shown below, a written request for a hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of the Court	Jason M. Krumbein, Esq.
U.S. Bankruptcy Court	Krumbein Consumer Legal Services, Inc.
701 E. Broad St., Suite 4000	5310 Markel Road, Suite 102
Richmond, VA 23219	Richmond, VA 23230

You must also attend a hearing to be scheduled at a later date.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

Date: August 21, 2014

/s/ Jason M. Krumbein, Esq.  
5310 Markel Road, Suite 102  
Richmond, VA 23230  
VSBN 43538

Special Counsel for Debtor in Bankruptcy

**CERTIFICATE OF SERVICE**

See certification in Application Attached hereto

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EASTERN DISTRICT OF VIRGINIA  
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	<b>Debtor.</b>	)	<b>Case No. 3:14-BK-30175-KRH</b>
		)	<b>Chapter 13</b>
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	<b>Keith Coleman</b>	)	
	<b>13705 Nashua Place</b>	)	
	<b>Midlothian, VA 23112</b>	)	
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Last four digits of SSN or ITIN:	<b>1717</b>	)	

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**MOTION TO EMPLOY SPECIAL COUNSEL**

**COMES NOW**, Krumbein Consumer Legal Services, Inc., counsel for Debtor(s), and pursuant to 11 USC 330 says as follows:

- 1) This motion is filed pursuant to 11 USC 30.

**JURISDICTION, VENUE, CORE PROCEEDING**

- 2) This court has jurisdiction pursuant to 28 USC 1441.
- 3) This is the proper venue pursuant 28 USC 1391.
- 4) This is a core proceeding pursuant to 28 USC 157.

**PARTIES**

- 5) The movants are the Debtors in the above identified case, as defined by the Bankruptcy Code.
- 6) Respondents are creditors as defined by the Bankruptcy code.

**FACTS**

- 7) Movants filed a Voluntary Petition for Relief in this court on 01/14/2014.

- 8) Movant wishes to employ special counsel to prosecute a complaint to determine validity, priority and extent of 2 liens on real property.
- 9) Counsel has agreed to represent movant if the court approves this employment.
- 10) Counsel is to be paid through the Chapter 13 Plan, upon approval by the court of a Supplemental fee application to be submitted at the completion of the action anticipated by this motion.

**RELIEF REQUESTED**

Movants request that the court approve the foregoing motion for the reasons stated above.

/s/ Jason M. Krumbein, Esq.  
Jason M. Krumbein, Esq. VSBN 43538  
Counsel for the Debtor(s) in Bankruptcy  
Krumbein Consumer Legal Services, Inc.  
5310 Markel Road, Suite 102  
Richmond, VA 23230  
Tel: 804.303.0204 Fax: 804.303.0209  
jkrumbein@krumbeinlaw.com

**CERTIFICATE OF SERVICE**

I certify that I have this August 21, 2014, transmitted a true copy of the foregoing application electronically through the court's CM/ECF system to the Chapter 13 Trustee and US Trustee, and by regular mail to the Debtor and all creditors listed on the attached Service List.

Argent Federal Credit Union c/o Edward S. Whitlock, III, Esq. Lafayette, Ayers & Whitlock, PLC 10160 Staples Mill Road, Suite 105 Glen Allen, VA 23060	American InfoSource LP as agent for Midland Funding LLC PO Box 268941 Oklahoma City, OK 73126-8941	Internal Revenue Service Insolvency Unit Post Office Box 7346 Philadelphia, PA 19114
KeyBank National Association 4910 Tiedeman Road Brooklyn, OH 44144	ALTAIR OH XIII, LLC C O WEINSTEIN, PINSON, AND RILEY, PS 2001 WESTERN AVENUE, STE 400 SEATTLE, WA 98121	Wells Fargo Bank, N.A. Attn: Bankruptcy Department 3476 Stateview Blvd., MAC #D3347- 014 Fort Mill SC 29715
Wells Fargo Bank, N.A. 1 Home Campus MAC X2303-01A Des Moines, IA 50328	Commonwealth of VA-Tax P.O. Box 2156 Richmond, VA 23218-2156	Keith Coleman 13705 Nashua Place Midlothian, VA 23112
Robert E. Hyman, Trustee BY ECF	Pia J. North, Esq. Counsel for Keith Coleman BY ECF	

/s/ Jason M. Krumbein, Esq.  
Special Counsel for the Debtor(s) in Bankruptcy